

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

**IN RE BARD IVC FILTERS PRODUCT
LIABILITY LITIGATION**

Civil Action No. 2:15-MD-02641-PHX-DGC
MDL No. 2641

This Document Relates to:
Susan Dunn,
2:18-cv-02875-DGC

STIPULATION OF DISMISSAL WITH PREJUDICE

COME NOW, Plaintiff, Susan Dunn, and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Defendants”), file this Stipulation of Dismissal with Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff and Defendants hereby stipulate to the dismissal of the above-captioned case with prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety with prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully Submitted,

/s/ Basil E. Adham
Basil E. Adham (TX Bar No. 24081742)
Johnson Law Group
2925 Richmond Avenue, Suite 1700
Houston, TX 77098
Telephone: (713) 626-9336
Facsimile: (713) 583-9460

Email: IVC@johnsonlawgroup.com

Attorney for Plaintiff

/s/ Richard B. North

Richard B. North, Jr., GA Bar #545599

Nelson Mullins Riley & Scarborogh, LLP

2017 17th St. NW, Suite 1700

Atlanta, GA 30363

Telephone: (404) 322-6000

Facsimile: (404) 322-6050

Email: Richard.north@nelsonmullins.com

Attorney for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of May, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which automatically sends an electronic notification to all counsel of record and other CM/ECF participants.

/s/ Basil E. Adham

Basil E. Adham